

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION  
AT CINCINNATI**

<b>LYNNE M. NILL, et ux,</b>	:	
	:	<b>Case No. C-1-01-755</b>
<b>Plaintiffs,</b>	:	
	:	<b>[Beckwith, J.; Hogan, M.J.]</b>
	:	
<b>vs.</b>	:	<b>NOTICE OF DEPOSITION <i>DUCES</i></b>
	:	<b><i>TECUM</i> OF DANIEL WOO, M.D.</b>
<b>PERRIGO SALES CORPORATION,</b>	:	
<b>et al.,</b>	:	
	:	
<b>Defendants.</b>	:	

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PLEASE TAKE NOTICE that defendant, Bristol-Myers Squibb Company, will take the deposition *duces tecum* upon oral examination of Daniel Woo, M.D., at the office of LOPEZ, HODES, RESTAINO, MILMAN & SKIKOS, 312 Walnut Street, Suite 2090, Cincinnati, Ohio 45202, tel: (513) 852-5600, on Thursday, December 16, 2004, commencing at 9:00 a .m., and continuing thereafter until completed.

The deponent shall produce documents listed on Exhibit "A" attached hereto no later than December 13, 2004, to Denise M. Smith, Esq., ULMER & BERNE LLP, 600 Vine Street, Suite 2800, Cincinnati, Ohio 45202.

The deposition will be conducted pursuant to the provisions of the Federal Rules of Civil Procedure, and will be stenographically recorded by Tammy G. Bates, CVR-CM. You are at liberty to appear and examine the witness.

Respectfully submitted,

/s/ Denise M. Smith

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**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that the foregoing Notice of Deposition *Duces Tecum* of Daniel Woo, M.D., was served this 29th day of November, 2004, via the Court's electronic filing system, first-class U.S. Mail, postage prepaid, and/or facsimile upon:

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/s/ Denise M. Smith